

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

GLOBAL PLASMA SOLUTIONS, INC.,

*Plaintiff,*

v.

D ZINE PARTNERS, LLC and

MARWA ZAATARI

*Defendants.*

CIVIL ACTION NO. 3:21-cv-00884-D  
JURY TRIAL DEMANDED

**DEFENDANTS DR. MARWA ZAATARI'S & D ZINE PARTNERS'  
MOTION FOR PROTECTION FROM DEPOSITION UNTIL NEW  
COUNSEL CAN BE LOCATED**

1. Defendant Dr. Marwa Zaatari, (“Defendant” or “Dr. Zaatari”) and Defendant D Zine Partners LLC, (“Defendant” or “D Zine”), file this the Defendants’ Motion for Protection from Deposition, and Defendants state as follows:

**I. TERMINATION OF COUNSEL**

2. Defendants have had a change in circumstances in that Defendants terminated their Counsel on Saturday, July 9, 2022. Such termination results in this requested delay due to the need to retain replacement counsel.

3. Defendants have already sought out counsel, but need time to fulfill the required financial requirements. Defendants request a one month delay in depositions and other deadlines.

**II. PROTECTION WILL NOT CAUSE UNDUE DELAY**

4. In any event, GPS is the source of the delay in this case, specifically in scheduling depositions. GPS has already waited a year to start depositions. GPS can

wait a few more weeks to depose Dr. Zaatari and D Zine, especially when the expert depositions are already being staggered into August 2022.

### **III. CURRENT DEPOSITION NOTICE BY GPS**

5. GPS has yet to provide all of the discovery items despite GPS being compeled to do so by this court. GPS has been playing coy and wasting this court's time by deflecting their responsibility and obfuscating the facts of this case. Dr. Zaatari was ready to be deposed in March, however enVerid council objected to any depositions prior to GPS providing full GPS discovery. To this date, GPS has not abided by the order to compel of discovery nor complied with full discovery. GPS just produced again last week, GPS Production number 14.

6. This Response to the GPS' Motion to Compel and Request for Protection has been necessitated by the legal change in circumstances.

### **IV. PRAYER**

Defendants Dr. Marwa Zaatari and D Zine respectfully request the Court to grant their Protective Motion and for such other relief as is proper. Defendants ask the Court for a thirty day extension in which to retain new Counsel.

Dated : July 11, 2022.

Respectfully submitted,

THE ESSMYER LAW FIRM

/s/ Michael M. Essmyer, Sr.

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**Current Attorneys for D Zine Partners,  
LLC and Marwa Zaatar  
CERTIFICATE OF CONFERENCE**

On Sunday the 10th day of July 2022 Defendants' current counsel Michael M. Essmyer, Sr. called GPS counsel Robert Mukenfuss at McGuire Woods and discussed the Defendants' proposed reset of the deposition of Defendant Marwa Zatari, Husband Ahmad Zaatari and Michael Studer. GPS opposes this Motion and has now filed its own Motion to Compel.

/s/ Michael M. Essmyer, Sr.  
Michael M. Essmyer, Sr.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in accordance with the applicable Federal Rules of Civil Procedure on this 11<sup>th</sup> day of July 2022.

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**ATTORNEYS FOR DEFENDANT ENVERID SYSTEMS, INC.**

*/s/ Michael M. Essmyer, Sr.*  
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